



November 23, 2005

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

*Re: 911 Compliance Letter in WC Docket No. 05-196*

Dear Ms. Dortch:

Segovia Inc. ("Segovia") hereby submits its compliance letter in accordance with the First Report and Order in WC Docket No. 05-196 (FCC 05-116, "911 Order").

### **Introduction**

Segovia is a leading provider of broadband, global IP satellite communications services to US governmental agencies, primarily the US Army and other military units. Through its managed, end-to-end private IP network, Segovia is able to provide critical voice and data communications that are secure, cost-effective, and able to reach users located all over the world – even in the most remote locations. Segovia services can be rapidly deployed and available 24x7x365 – ideal for emergency responders and military logistical commands. Virtually all of Segovia's VoIP services are provided to federal military agencies located outside the United States, and are therefore outside the scope of the FCC's 911 Order.

Segovia does provide interconnected VoIP services (IP Centrex and IP PBX) over its network to a few government customers, including customers with locations throughout the United States. These government customers are emergency first responder units themselves. Segovia is also providing *free* voice connectivity to a Louisiana police department to assist them with their Hurricane Katrina relief effort using Segovia's mobile satellite broadband technology.

Currently, US VoIP – PSTN terminations are provided via arrangements with a number of domestic service providers. Segovia is in the process of migrating its VoIP services from these vendors to an internal Segovia VoIP platform. A third-party vendor, however, will continue to provide VoIP – PSTN gateway services.

### **911 Solution**

Segovia currently does not provide 911 services to its interconnected VoIP services customers in any geographic area in the United States. Each of Segovia's federal government customers has

been provided with notification and warning stickers that 911 service is presently unavailable, and Segovia has obtained a record of affirmative acknowledgement from each such customer of having received and understood this advisory. Segovia is in the planning phase of implementing a 911 solution through arrangements to be made with one or more vendors that will provide 911 routing and connectivity to the respective wireline 911 Network. Customer information will be provided by Segovia to the selected 911 service provider via means specified by the vendor.

In accordance with the 911 Order and Public Notice, DA 05-2945 (dated, Nov. 7, 2005), pending its implementation of a 911 solution, Segovia is not marketing interconnected VoIP services and accepting new interconnected VoIP customers in the United States.

### **Obtaining Initial Registered Location Information/Updated Registered Location Information**

Upon finalization of Segovia's migration plan, Segovia will send letters to each of its respective customer program offices requesting the initial registration information for each VoIP phone on Segovia's network. Customers will also be provided with the means to notify Segovia of their relocation or any change/update to the initial registered location. Segovia customer service representatives will then update the Segovia database via transactional processing for tactical updates or batch processing for planned or scheduled updates.

### **Technical Solution for Nomadic Subscribers**

The methodology for nomadic subscribers to register their location information is currently under development.

### **Conclusion**

Segovia is currently taking the following steps towards full compliance with the 911 Order:

- Migration of VoIP services to an internal Segovia platform
- Selection of 911 service provider
- Solicitation of Segovia US customer base for the purpose of providing initial and updated registration information
- Development and implementation of methodology for allowing nomadic subscribers to update registered location information

Thank you for your attention to this matter. Please direct any questions regarding this Compliance Letter to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Friedlander". The signature is fluid and cursive, with the first name "Lisa" and last name "Friedlander" clearly distinguishable.

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